Michael J. Hanson Call & Hanson, P.C. 413 G Street Anchorage, AK 99501-2126

Phone: (907) 258-8864 Fax: (907) 258-8865 E-Mail: mjh@chklaw.net

Attorneys for

Defendant Christopher F. Twiford, D.C.

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF ALASKA

JACLYN CABALES and JONATHAN CABALES,

Plaintiffs,

v.

ALBERT E. MORGAN, D.C., ARCTIC CHIROPRACTIC BETHEL, LLC, and CHRISTOPHER F. TWIFORD, D.C.,

Defendants.

ARCTIC CHIROPRACTIC BETHEL, LLC,

Third-Party Plaintiff,

v.

UNITED STATES OF AMERICA,

Third-Party Defendant.

Case No.: 3:14-cv-00161-JWS

MOTION FOR PARTIAL SUMMARY JUDGMENT ON CLAIMS OF NEGLIGENT HIRING AND NEGLIGENT SUPERVISION

MOTION FOR PARTIAL SUMMARY JUDGMENT ON CLAIMS OF NEGLIGENT HIRING AND NEGLIGENT SUPERVISION

Cabales v. Morgan, Arctic Chiro, and Twiford, 3:14-cv-00161-JWS Page 1 of 2 Phone (907) 258-8864 • Fax (907) 258-8865

COMES NOW Defendant Christopher F. Twiford, D.C., by and through counsel, Call & Hanson, P.C., and pursuant to Federal Rules of Civil Procedure, Rule 56, moves this court for summary judgment in favor of Defendant Twiford and against plaintiffs on claims for negligent hiring and negligent supervision. This motion is supported by Memorandum of Points and Authorities, the deposition testimonies of Jaclyn Cabales and Jonathan Cabales, the affidavit of Brooke Arnett, discovery responses from Defendant Twiford, and the reports from Dr. Mark J. Sepulveda and Dr. Alan H. Bragman.

> CALL & HANSON, P.C. Attorneys for Defendant Christopher F. Twiford, D.C.

Dated: January 21, 2015

By: s/Michael J. Hanson

Michael J. Hanson 413 G Street

Anchorage, AK 99501-2126 Phone: (907) 258-8864

Fax: (907) 258-8865 E-mail: mjh@chklaw.net

ABA No.: 8611115

CERTIFICATE OF SERVICE

I certify that on this 21st day of January, 2015, a true and correct copy of the foregoing document, and attachments if any, were served electronically upon the following counsel of record:

Myron Angstman John P. Cashion Robert J. Campbell Dennis E. Boyle Gary M. Guarino

s/Michael J. Hanson

MOTION FOR PARTIAL SUMMARY JUDGMENT ON CLAIMS OF NEGLIGENT HIRING AND **NEGLIGENT SUPERVISION**

Cabales v. Morgan, Arctic Chiro, and Twiford, 3:14-cv-00161-JWS Page 2 of 2